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July 19, 2005

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VIA ELECTRONIC FILING

PUC Filing Center
Public Utility Commission of Oregon
PO Box 2148
Salem, OR 97308-2148

**Re: Joint Applicants' Motion for Standard Protective Order
Docket UM 1209**

Enclosed for filing please find Joint Applicants' Motion for Standard Protective Order in the above-referenced docket.

Very truly yours,

A handwritten signature in black ink, appearing to be "Katherine A. McDowell", written over a horizontal line.

Katherine A. McDowell

KAM:knp
Enclosure

1 BEFORE THE PUBLIC UTILITY COMMISSION
2 OF OREGON

3 UM 1209

4 In the Matter of the Application of
5 MIDAMERICAN ENERGY HOLDINGS
6 COMPANY's and PACIFICORP's Joint
7 Application for an Order Authorizing
8 MEHC to Exercise Substantial Influence
9 Over the Policies and Actions to PacifiCorp

**JOINT APPLICANTS' MOTION FOR
STANDARD PROTECTIVE ORDER**

10 Pursuant to OAR 860-12-0035(1)(k), PacifiCorp and MidAmerican Energy Holdings
11 Company ("MEHC") (collectively "Joint Applicants") move for entry of the Commission's
12 standard protective order in this proceeding. As good cause for this motion, Joint Applicants
13 state:

14 1. The Commission's rules authorize Joint Applicants to seek reasonable
15 restrictions on discovery of trade secrets and other confidential business information. *See*
16 OAR 860-11-0000(3) (adopting Oregon Rules of Civil Procedure ("ORCP"));
17 ORCP 36(C)(7) (providing protection against unrestricted discovery of "trade secrets or other
18 confidential research, development, or commercial information"). *See also In re*
19 *Investigation into the Cost of Providing Telecommunication Service (UM 351)*, Order
20 No. 91-500 (1991) (recognizing that protective orders are a reasonable means to protect "the
21 rights of a party to trade secrets and other confidential commercial information" and "to
22 facilitate the communication of information between litigants").

23 2. The Joint Applicants anticipate that discovery in this proceeding may include
24 propriety due diligence materials, confidential market analyses and business projections,
25 confidential analytical models, commercially sensitive financial information, confidential
26 employee data, or confidential information regarding contracts for the purchase or sale of
electric power, power services, or fuel. PacifiCorp and MEHC will be exposed to

1 competitive injury if they are forced to make unrestricted disclosure of their confidential
2 business information.

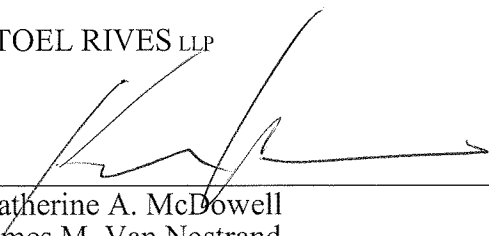
3 3. It is likely that Staff and others in this proceeding will seek to discover a large
4 amount of information held by Joint Applicants, including confidential business information.
5 “The Commission’s standard blanket protective order is designed to facilitate discovery in
6 cases involving discovery of large numbers of documents.” *See In re Portland Extended*
7 *Area Service Region (UM 261)*, Order No. 91-958 (1991). Issuance of a protective order will
8 facilitate the production of relevant information and expedite the discovery process.

9 4. The ALJ’s memorandum issued on July 15, 2005 indicated that discovery in
10 this case could commence following the filing of petitions to intervene. For this reason, Joint
11 Applicants request expedited treatment of this Motion.

12 For the foregoing reasons, PacifiCorp and MEHC request entry of the Commission’s
13 standard protective order in this docket.

14 DATED: July 19, 2005.

15 STOEL RIVES LLP

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18 _____
Katherine A. McDowell
James M. Van Nostrand

19 Attorneys for PacifiCorp and MEHC
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CERTIFICATE OF SERVICE

1
2 I hereby certify that I served a true and correct copy of the foregoing document on the
3 following named person(s) on the date indicated below by first-class mail addressed to said
4 person(s) at his or her last-known address(es) indicated below.

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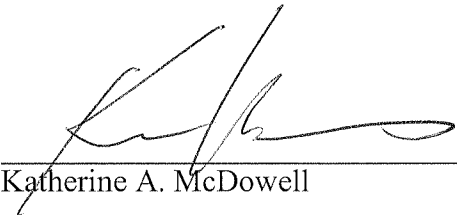
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